



333 EARLE OVINGTON BOULEVARD, SUITE 402
UNIONDALE, NEW YORK 11553
T: 516-203-7600
F: 516-282-7878

June 14, 2024

Via ECF

Hon. Ronnie Abrams
U.S. District Court, Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: *Stephen Yang v. Earl G. Graves, LTD. d/b/a Black Enterprise*
Docket No: 24-CV-3304 (RA)

Dear Judge Abrams:

We are the attorneys for Plaintiff Stephen Yang (“Plaintiff”) in this matter. Pursuant to Section I(D) of Your Honor’s Individual Rules and Practices, we write to respectfully request an adjournment of the initial conference date until at least fourteen (14) days after Defendant Earl G. Graves, LTD. d/b/a Black Enterprise (“Defendant”)’s deadline for responding to the Complaint. As an initial matter, the undersigned will be out of the country between June 23 through June 28, 2024 on a prescheduled trip. Additionally, the adjournment would permit the parties to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant’s response to the Complaint. Further, the additional time will help conserve resources which will facilitate the parties’ settlement discussions.

On May 29, 2024, the Defendant submitted a stipulation requesting an extension of its deadline to answer the Complaint to July 28, 2024, which was granted by the Court on May 30, 2024 (ECF No. 12). Pursuant to ECF No. 7, an initial conference is currently set for June 28, 2024. Defendant consents to this request and no other adjournments or extensions were previously sought.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

/s Renee J. Aragona
Renee J. Aragona

cc: all counsel of record via ECF

Application granted. The conference scheduled for June 28, 2024 is hereby adjourned to July 19, 2024 at 10:30 a.m. The parties shall submit their joint letter and case management plan and proposed scheduling order no later than July 12, 2024.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'RJ', is placed above a horizontal line. Below the line, the text 'Hon. Ronnie Abrams' is printed in a black sans-serif font, followed by 'June 14, 2024' in a smaller font.